

Bay Delta Conservation Plan Document Review Comment Form

Please use this form to document your comments to the [redacted]. Please number your comments in the first column, indicate your agency affiliation in the second column, and reference the comment's location in the review document in the Section, Page, and Line (if provided) columns. Return completed comment forms to [redacted] by COB [redacted]

To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the Resolution column.

Document: Admin DEIS Chapter 2

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Date: _____

No.	Agency	Page #	Section #	Line #	Comment	Disposition
	EPA	2-1	2.1	17	It is important to use language that supports the often-stated goal that Delta ecosystem restoration and reliable water supply are equal goals of the BDCP. Using the term "regulatory constraints" to refer to water that supports aquatic resource designated uses does not place ecosystem restoration as an equal goal with reliable water supply. The paragraph starting at line 30 which discusses declining fish populations does not refer to CVP and SWP operations as "constraints" on a vibrant or sustainable fishery.	
	EPA	2-5	Project need		This section lacks a clear, declarative sentence, stating the project need. Instead of "the project need is derived from" Please state more directly the project needs.	
	EPA		Project	29	What are the key criteria by which the Delta is perceived	

			need		to be in crisis. These are worth explaining in detail in the need section.	
	EPA		Project need	general cmmnt	Need section does not contain robust information supporting a need for the project. There is a considerable amount of quantitative information illustrating the ecological crisis in the Delta. There are historical and recent trends in fish populations; there are data describing persistent water quality problems in the Delta (303(d)) list. Similarly, there is much information demonstrating the vulnerability of the current water system to threats of levee collapse and sea level rise.	
	EPA	2-4	2.4	6	The CEQA <i>fundamental</i> purpose statement under project objectives does not reflect equality among goals of water supply reliability and ecosystem restoration. "Minimizing adverse effects on listed species" is a lesser goal than "... providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem," which is the language in the sentence immediately preceding. (p. 2-4, line 5) This creates confusion. The CEQA fundamental purpose does not provide equal support for improving reliability of water supply and restoration and protection of the Delta Ecosystem. But the language in the Federal NEPA statement (p. 2-5, line 16-18) does provide equal support for these goals. This inconsistency may cause readers to question whether BDCP is equitably pursuing ecosystem and water supply goals or whether the water supply reliability goal is primary to ecosystem restoration and protection goal which consists of only minimizing adverse effects to listed species.	
	EPA	2-4	2.6.1	35	There is a large time-step between pre-European settlement variability and timing of flows, salinity and habitat and 1940. Readers will wonder what actions happened in between these time periods to contribute to the current state of the Delta ecosystem.	

